

ROPES & GRAY LLP  
Gregg M. Galardi  
Joshua Y. Sturm  
1211 Avenue of the Americas  
New York, NY 10036-8704  
Telephone: (212) 596-9000  
Facsimile: (212) 596-9090

*Counsel to the Plan Administrator  
for the Debtors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
In re	:	Chapter 11
	:	
Gawker Media LLC, <i>et al.</i> , <sup>1</sup>	:	Case No. 16-11700 (SMB)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

**NOTICE OF PRESENTMENT OF STIPULATION AND ORDER  
TO PERMIT AIG EUROPE LIMITED TO MAKE PAYMENTS OF  
ACCRUED INSURED COSTS UNDER CERTAIN INSURANCE POLICY**

PLEASE TAKE NOTICE that AIG Europe Limited (“AIG” or “Insurer”) has requested entry of an order granting relief from Article 9 of the *Debtors’ Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft.* (the “Plan”) or any provision of the *Findings of Fact, Conclusions of Law, and Order Confirming Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft.* [Docket No.

---

<sup>1</sup> The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.’s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Plan Administrator, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.’s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

638], to the extent applicable, to permit the Insurer to advance and/or pay Accrued Insured Costs<sup>2</sup> under the CorporateGuard Directors and Officers Liability Policy No. 33025154 (the “Policy”) issued to Gawker Media Group, Inc. (“GMGI”);

**PLEASE TAKE FURTHER NOTICE** that following good-faith, arm’s-length negotiations between the Plan Administrator for GMGI and AIG, and in order to avoid unnecessary expense and delay, the Parties have agreed, subject to the reservation of rights contained therein, to the stipulation and order attached hereto as **Exhibit A** (the “Stipulation and Order”), with respect to consent to relief from any prohibitions in the Plan or the Confirmation Order, to the extent applicable, for the purpose of authorizing the Insurer to pay or advance Accrued Insured Costs under the Policy;

**PLEASE TAKE FURTHER NOTICE** that, absent objections, the undersigned will present the Stipulation and Order for signature to the Court on **October 6, 2017 at 4:00 p.m.**; and

**PLEASE TAKE FURTHER NOTICE** that responses or objections to the Stipulation and Order, if any, shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall set forth the basis for the response or objection and the specific grounds therefore, and shall be filed with the Court electronically in accordance with General Order M-399 by registered users of the Court’s case filing system (the User’s Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Court), with a hard copy delivered directly to chambers and

---

<sup>2</sup> “Accrued Insured Costs” means reasonable and necessary unreimbursed costs incurred to date that were or may be reimbursable under the Policy.

served so as to be actually received no later than **October 3, 2017 at 4:00 p.m.** (prevailing Eastern Time), upon (i) the Plan Administrator for the Debtors, Attn: William D. Holden (wholden@Dacarba.com); (ii) counsel to the Plan Administrator for the Debtors, Ropes & Gray LLP, 1211 Avenue of the Americas, New York, NY 10036, Attn: Gregg M. Galardi (gregg.galardi@ropesgray.com); (iii) the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, NY 10014, Attn: Greg Zipes & Susan Arbeit; (iv) counsel for AIG, Peabody & Arnold LLP, Federal Reserve Plaza, 600 Atlantic Avenue, Boston, MA 02210, Attn: Stephanie Kao (skao@peabodyarnold.com); and (v) those persons who have formally appeared and requested service in these cases pursuant to Bankruptcy Rule 2002.

Dated: September 20, 2017  
New York, New York

/s/ Gregg M. Galardi  
ROPES & GRAY LLP  
Gregg M. Galardi  
Joshua Y. Sturm  
1211 Avenue of the Americas  
New York, NY 10036-8704  
Telephone: (212) 596-9000  
Facsimile: (212) 596-9090  
gregg.galardi@ropesgray.com  
joshua.sturm@ropesgray.com

*Counsel to the Plan Administrator for  
the Debtors*